

PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No.143717) (*admitted pro hac vice*)
Ira D. Kharasch (CA Bar No. 109084) (*admitted pro hac vice*)
John A. Morris (NY Bar No. 2405397) (*admitted pro hac vice*)
Gregory V. Demo (NY Bar No. 5371992) (*admitted pro hac vice*)
Hayley R. Winograd (NY Bar No. 5612569) (*admitted pro hac vice*)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Telephone: (310) 277-6910
Facsimile: (310) 201-0760

HAYWARD PLLC

Melissa S. Hayward
Texas Bar No. 24044908
MHayward@HaywardFirm.com
Zachery Z. Annable
Texas Bar No. 24053075
ZAnnable@HaywardFirm.com
10501 N. Central Expy, Ste. 106
Dallas, Texas 75231
Tel: (972) 755-7100
Fax: (972) 755-7110

Counsel for Highland Capital Management, L.P.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹	§	
	§	Case No. 19-34054-sgj11
Debtor.	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.,	§	
	§	
Plaintiff,	§	Adversary Proceeding No.
	§	
vs.	§	21-03003-sgj
	§	
JAMES DONDERO,	§	
	§	
Defendant.	§	

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

**DECLARATION OF JOHN A. MORRIS
IN SUPPORT OF THE DEBTOR'S OBJECTION TO MOTION TO
COMPEL DEPOSITION TESTIMONY OF JAMES P. SEERY, JR.**

I, John A. Morris, pursuant to 28 U.S.C. § 1746(a), under penalty of perjury, declare as follows:

1. I am an attorney in the law firm of Pachulski, Stang, Ziehl & Jones LLP, counsel to the above-referenced Debtor, and I submit this Declaration in support of the *Debtor's Objection to Motion to Compel Deposition Testimony of James P. Seery, Jr.* (the "Objection") being filed concurrently with this Declaration. I submit this Declaration based on my personal knowledge and review of the documents listed below.

2. Attached as **Exhibit 1** is a true and correct copy of the Debtor's *Complaint for (I) Breach of Contract and (II) Turnover of Property of the Debtor's Estate* filed in the above-referenced adversary proceeding at Docket No. 1.

3. Attached as **Exhibit 2** is a true and correct copy of *Defendant James Dondero's Original Answer* filed in the above-referenced adversary proceeding at Docket No. 6.

4. Attached as **Exhibit 3** is a true and correct copy of *Defendant James Dondero's Objections and Responses to Highland Capital Management, L.P.'s First Request for Admissions* dated April 28, 2021.

5. Attached as **Exhibit 4** is a true and correct copy of *Defendant James Dondero's Objections and Responses to Highland Capital Management, L.P.'s First Set of Interrogatories* dated April 26, 2021.

6. Attached as **Exhibit 5** is a true and correct copy of *Defendant James Dondero's Amended Answer* filed in the above-referenced adversary proceeding at Docket No. 16.

7. Attached as **Exhibit 6** is a true and correct copy of *Defendant James Dondero's Objections and Responses to Highland Capital Management, L.P.'s Second Set of Interrogatories* dated May 7, 2021.

8. Attached as **Exhibit 7** is a true and correct copy of *Defendant James Dondero's Objections and Responses to Highland Capital Management, L.P.'s Second Request for Admissions* dated May 7, 2021.

Dated: May 18, 2021

/s/ John A. Morris
John A. Morris